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United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, D.C. 20240

IN REPLY REFER TO:

ER-04/0712

OCT 28 2004

Docket No.03-101-2
Regulatory Analysis and Development, PPD
APHIS, Station 3C71
4700 River Road, Unit 118
Riverdale, Maryland 20737-1238

To Whom It May Concern:

The National Park Service (NPS) is pleased to comment on the Notice of Intent to prepare an Environmental Impact Statement (EIS) for herbicide-tolerant creeping bentgrass. This is an issue of concern to us because dozens of parks contain close relatives of creeping bentgrass. These relatives could hybridize with the herbicide-tolerant varieties and the hybrids could become weeds, unable to be controlled with glyphosate.

The NPS would like to suggest inclusion of an additional alternative in the EIS. This would involve withholding deregulation of the herbicide-tolerant varieties until the petitioner incorporates molecular strategies for containment of the gene for herbicide tolerance. Several options might be available, with sterile seed as just one example. It would seem that this alternative might allow us to achieve all the environmental benefits of herbicide-tolerant creeping bentgrass, while mitigating or eliminating the environmental cost and risks associated with gene flow.

We appreciate the opportunity to provide these comments.

Sincerely,

Jacob J. Hoogland
Chief, Environmental Quality Division
National Park Service

OCT 29 2004